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**CITIZENS**  
communications



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SECRETARY

November 20, 1997

**FEDERAL EXPRESS**

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

**Re: Docket No. 97-00888, Universal Service Generic Contested Case**

Citizens Telecommunications Company of Tennessee, LLC, and  
Citizens Telecommunications Company of the Volunteer State, LLC --  
Request For Designation As Eligible Telecommunications Carriers

Dear Mr. Waddell:

This letter is written pursuant to the Tennessee Regulatory Authority's Order Establishing Procedures For Designation Of Eligible Telecommunications Carriers Pursuant To Section 214(e)(2) of the Telecommunications Act of 1996 And FCC Order 97-157 (the "ETC Order.") Pursuant to the ETC Order, Citizens Telecommunications Company of Tennessee, LLC, and Citizens Telecommunications Company of the Volunteer State, LLC hereby request designation as Eligible Telecommunications Carriers ("ETCs").

I am Vice President of Citizens Utilities Company's Communications Sector and Vice President of Citizens Utilities Company's Tennessee incumbent local exchange companies, Citizens Telecommunications Company of Tennessee, LLC and Citizens Telecommunications Company of the Volunteer State, LLC (the "Citizens LECs"). I am responsible for all facets of the business and operations of the Citizens LECs and am authorized to execute this request for designation of the Citizens LECs as Eligible Telecommunications Carriers pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (47 U.S.C. §214(e)(2)) (the "Act").

The Citizens LECs and their predecessors in interest have long provided ubiquitous residential and business basic exchange and other telecommunications services in their respective Tennessee service areas. Each has functioned as the "carrier of last resort" in the areas they serve, holding out and providing service to all needing it, pursuant to terms and conditions, including pricing, regulated by the TRA and the former Tennessee Public Service Commission. The Citizens LECs are the historic providers of universal service in the communities that they are privileged to serve.

Under Section 214(e) of the Act and related FCC regulations, the ability of the Citizens LECs to receive federal funding for their continued provision of critical portions of the Act's Section 254 universal service program is predicated upon TRA designation as ETCs. As shown herein, the Citizens LECs meet all qualification criteria for Section 214(e) eligibility designation.

The Federal Communications Commission ("FCC"), in Section 54.101(a)(1) of its Rules, has delineated the "services that are supported by universal service support mechanisms under Section 254(c)." Those services are:

- (1) Voice grade access to the public switched network;
- (2) Local usage, i.e., a prescribed amount of minutes of use of exchange service, provided free of charge to end users;
- (3) Dual tone multi-frequency signaling or its functional equivalent;
- (4) Single-party service or its functional equivalent;
- (5) Access to emergency services, including access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;
- (6) Access to operator services;
- (7) Access to interexchange service;
- (8) Access to directory assistance; and
- (9) Toll limitation for qualifying low-income consumers.

With two limited exceptions, the Citizens LECs provide all of the foregoing universal services. The first exception pertains to access to emergency services. The Citizens LECs provide such access to the full extent of local government implementation of emergency services in the territories included within those LECs' service areas. To the extent that local governments in territories within the

Citizens LEC service areas are still implementing or have yet to implement emergency services, the Citizens LECs will take all steps necessary to ensure access to such services as and when they become operational.

Insofar as toll limitation to qualifying low-income customers is concerned, the Citizens LECs can and will provide toll blocking services. However, neither the Citizens LECs nor any other local exchange carrier that they are aware of is currently capable of providing "toll control" service. Further, there is no industry understanding of when, if ever, the necessary technology will be available to implement this service. For this reason, the FCC requirement for toll control is the subject of multiple petitions for reconsideration. Exceptional circumstances exist, for a grant of additional time, pursuant to Section 54.101(c), for implementation of the "toll control" service requirement. The public interest in the maintenance and extension of universal service would be thwarted by requiring the currently impossible -- toll control -- as a condition precedent to ETC certification.

We are unaware at this time when we will be in the position to offer toll control. As indicated, the technology does not currently exist, and we do not know when, if ever, it will be available. At such time as the necessary technology becomes available, we will be able to notify the TRA of when it will be installed and toll control services made available to our customers.

All of the foregoing supported services, with the exception of toll control, are and will continue to be available throughout the service areas of both Citizens LECs. Those service areas are identical to each of the Citizens LEC's FCC-designated study areas. Further, all of the foregoing services, except for operator and directory assistance services, are provided through the use of physical facilities owned by the Citizens LECs. In the case of operator and directory assistance services, the Citizens LECs resell the services of other entities. However, the physical access, *i.e.*, transport facilities used in such operations are provided on the Citizens LECs infrastructure.

The Citizens LECs' provision of supported services is known throughout the territories they serve. Further, the Citizens LECs' tariffs are available for public inspection and customer contact representatives are available, both in person and via toll-free telephone numbers, to provide service and rate

information. Further, the Citizens LECs will advertise the availability and charges for these services.

Please direct any questions on this ETC designation request to our counsel, Richard M. Tettelbaum, Suite 500, 1400 16th St., N.W., Washington, D.C. 20036.

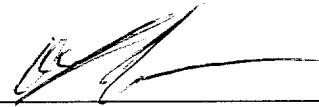
Yours very truly,

CITIZENS TELECOMMUNICATIONS COMPANY OF TENNESSEE LLC

and

CITIZENS TELECOMMUNICATIONS COMPANY OF THE VOLUNTEER STATE  
LLC

By: \_\_\_\_\_




O. Lee Jobe, Vice President

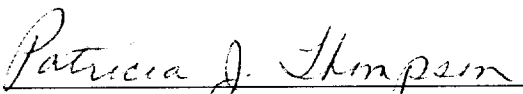
VERIFICATION

State of Connecticut  
County of Fairfield

Lee Jobe, Vice President of Citizens Utilities Company's Communications Sector, Citizens Telecommunications Company of Tennessee, LLC, and Citizens Telecommunications Company of the Volunteer State, LLC, named in the foregoing instrument and being duly sworn, says that the facts and allegations therein contained are true, except insofar as they are therein stated to be on information and belief, in which case he believes them to be true.

  
\_\_\_\_\_  
Lee Jobe

Taken, sworn to and subscribed before me this 20<sup>th</sup> day of November, 1997.

  
\_\_\_\_\_  
Notary Public in and for said County

My commission expires of the 20<sup>th</sup> day of September, 1998.